

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION


ALD SOCIAL LLC,

Plaintiff,

V.

VERKADA INC.,

Defendant.



Civil Action No. 6:22-cv-00975-FB

JURY TRIAL DEMANDED

**DECLARATION OF PATRICK W. LAUPPE IN SUPPORT OF VERKADA INC.'S
MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Patrick W. Lauppe, hereby declare:

1. I am an attorney with Cooley LLP and counsel to Defendant Verkada Inc. (“Verkada” or “Defendant”). I make this declaration in support of Verkada’s Motion to Transfer Venue to the Northern District of California. I have personal knowledge of the facts contained within this declaration, and if called as a witness, would testify to the matters contained herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a “General Information” webpage for ALD Social LLC on the Delaware Division of Corporations website, available at <https://icis.corp.delaware.gov/eCorp/EntitySearch/NameSearch.aspx>, last accessed on November 4, 2022.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Google Flights search results for a one-way flight from the Seattle-Tacoma International Airport to the San Francisco International Airport on October 3, 2023, last accessed on November 18, 2022.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Google Flights search results for a one-way flight from the Seattle-Tacoma International Airport to the San Antonio International Airport on October 3, 2023, last accessed on November 18, 2022.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the LinkedIn profile for William Bollman, available at <https://www.linkedin.com/in/williambollman/>, last accessed on November 23, 2022.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the “Our Firm” page on the website for Tarolli, Sundheim, Covell & Tummino LLP, available at www.tarolli.com/our-firm/, last accessed on November 23, 2022.

7. Attached hereto as **Exhibit 6** is a true and correct copy of a table summarizing inventors and inventor location information disclosed on prior art patents and patent publications

disclosed on the face of U.S. Patent Nos. 9,198,054 and 9,402,158.

8. Attached hereto as **Exhibit 7** is a true and correct copy of U.S. Patent No. 8,195,598.

9. Attached hereto as **Exhibit 8** is a true and correct copy of U.S. Patent No. 7,788,188.

10. Attached hereto as **Exhibit 9** is a true and correct copy of U.S. Patent No. 8,560,608.

11. Attached hereto as **Exhibit 10** is a true and correct copy of U.S. Patent No. 6,006,159.

12. Attached hereto as **Exhibit 11** is a true and correct copy of Google Maps search results showing road travel trajectory and duration information beginning at 8:00 A.M. Pacific Time between Verkada's San Mateo office (406 E 3rd Ave, San Mateo, CA 94401) and the Phillip Burton Federal Building (450 Golden Gate Ave, San Francisco, CA 94102), last accessed on November 18, 2022.

13. Attached hereto as **Exhibit 12** is a true and correct copy of Google Maps search results showing road travel trajectory and duration information beginning at 8:00 A.M. Pacific Time between Verkada's San Mateo office (406 E 3rd Ave, San Mateo, CA 94401) and the Robert F. Peckham Federal Building (280 S Second St, San Jose, CA 95113), last accessed on November 18, 2022.

14. Attached hereto as **Exhibit 13** is a true and correct copy of Google Maps search results showing road travel trajectory and duration information beginning at 8:00 A.M. Pacific Time between Verkada's San Mateo office (406 E 3rd Ave, San Mateo, CA 94401) and the Ronald V. Dellums Federal Building (1301 Clay St, Oakland, CA 94612), last accessed on November 18,

2022.

15. Attached hereto as **Exhibit 14** is a true and correct copy of Google Flights search results for a one-way flight from the San Francisco International Airport to the San Antonio International Airport on October 3, 2023, last accessed on November 18, 2022.

16. Attached hereto as **Exhibit 15** is a true and correct copy of Google Maps search results showing road travel trajectory and duration information between Verkada's San Mateo office (406 E 3rd Ave, San Mateo, CA 94401) and the San Antonio, Texas Federal Courthouse (262 W Nueva St, San Antonio, TX 78207), last accessed on November 18, 2022.

17. Attached hereto as **Exhibit 16** is a true and correct copy of Google Flights search results for a one-way flight from the Philadelphia International Airport to the San Francisco International Airport on October 3, 2023, last accessed on November 18, 2022.

18. Attached hereto as **Exhibit 17** is a true and correct copy of Google Flights search results for a one-way flight from the Philadelphia International Airport to the San Antonio International Airport on October 3, 2023, last accessed on November 18, 2022.

19. Attached hereto as **Exhibit 18** is a true and correct copy of Google Flights search results for a one-way flight from the Cleveland Hopkins International Airport to the San Francisco International Airport on October 3, 2023, last accessed on November 23, 2022.

20. Attached hereto as **Exhibit 19** is a true and correct copy of Google Flights search results for a one-way flight from the Cleveland Hopkins International Airport to the San Antonio International Airport on October 3, 2023, last accessed on November 23, 2022.

21. Attached hereto as **Exhibit 20** is a true and correct copy of Google Flights search results for a one-way flight from the Dulles International Airport to the San Francisco International Airport on October 3, 2023, last accessed on November 23, 2022.

22. Attached hereto as **Exhibit 21** is a true and correct copy of Google Flights search results for a one-way flight from the Dulles International Airport to the San Antonio International Airport on October 3, 2023, last accessed on November 23, 2022.

23. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts of the Federal Court Management Statistics report, U.S. District Courts – Federal Court Management Statistics – Comparison Within Circuit – During the 12-Month Period Ending June 30, 2022, available at <https://www.uscourts.gov/statistics/table/na/federal-court-management-statistics/2022/06/30-3>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Palo Alto, California on this 25th day of November, 2022.

/s/ Patrick W. Lauppe
Patrick W. Lauppe

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on November 25, 2022, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ Heidi L. Keefe
Heidi L. Keefe